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Kevin J. O'Connor
Shareholder

VIA ECF

December 13, 2023

Hector Gonzalez, U.S.D.J.
United States District Court,
Eastern District of New York
U.S. Courthouse, Room 6A South
Brooklyn, NY 11201

Re: Securities and Exchange Comm'n v. Joseph Laura, et al.
Case No.: 1:18-cv-05075-NGG
Our File No.: 11018-386750

Dear Judge Gonzalez:

This firm represents Defendants Joseph Laura (“Laura”) and Anthony Sichenzio (“Sichenzio” and, with Laura, collectively referred to herein as “Defendants”) in this action commenced by the Securities and Exchange Commission (the “Commission”). The purpose of this letter is, with the consent of the Commission, to seek an adjustment to the briefing schedule on the Commission’s application for disgorgement and penalties.

The current deadline for Defendants’ opposing submission is this Friday, December 15, 2023. Due to the complexity of the motion coupled with unexpected urgencies in other federal court matters, it has become necessary to seek an additional three weeks to prepare and file opposition to the Commission’s motion. It is also hopeful that this additional time will be used to continue efforts at resolution. The Commission has agreed to this request provided the due date for its reply is extended to January 26, 2024.

Accordingly, we request that the following new schedule be set in place: Defendants’ Opposition: January 5, 2024; Commission’s reply, January 26, 2024.

We thank the Court in advance for the courtesy of considering this request.

Respectfully submitted,

/s/ Kevin J. O'Connor

KEVIN J. O'CONNOR

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cc: All Counsel of Record (by ECF)